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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF ALICIA ROHBOCK**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Alicia Rohbock, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 26, 2022.
5. I was born in January 1977 and was placed in an arranged spiritual marriage to Rulon Jeffs in April 1997.
6. Based on my fraud claim against Warren Jeffs, I conservatively estimate that I incurred economic damages, including lost wage damages of \$248,813 as summarized in trial Exhibit A, and medical bills as more specifically set forth in this Damages Declaration.
7. The work I did for Jeffs was demanding and required me to be available almost constantly. I was not paid for any of my labor or services.
8. From the time I started to work for the benefit of Warren Jeffs when I was 18, I received the necessities of life from either my parents or my spiritual husbands until I fled the FLDS in June of 2012.
9. Depending on whether I was being favored or punished, my accommodations sometimes provided a very poor standard of living similar to that experienced by other victims of labor trafficking and at other times a slightly higher standard more similar to that experienced by some sex trafficking victims. By 2007, for example, I was being corrected by Jeffs and kept in horrible living conditions.
10. The value of those necessities should be set off against the higher hourly rate (above

minimum wage) that I should have been paid from the time I was 18.

11. I estimate the value of the necessities I received while a plural wife at \$300 a month over seventeen and a half years (210 months x \$300) for a total of \$63,000, which total amount may, in the Court's discretion, be deducted from my economic damages.

12. As I testified at trial, due to the stress I experienced in the FLDS, I became ill at a young age, sometimes septic, lost my hair, and developed Ankylosing Spondylitis ("AS") which is a terrible disease that will progressively rob me of my spine. At trial, I estimated my past medical bills to be more than \$100,000.

13. Since trial, I have been told that a three-level cervical fusion is needed in the very near future as I am living in chronic pain and my left arm is already partially paralyzed because of my AS. This is only one of the surgeries I have already had that are attributable to the stress and injury I suffered under Jeffs and his refusal to allow me to obtain medical care.

14. I also have to take Enbrel for my AS at a cost of \$7,000 per month. If I am able to live 10 more years, the cost of the Enbrel alone will be \$840,000 (\$7,000 x 10 years x 12 months). I can only estimate based on what I have learned about AS that my future medical bills will be well over \$1,500,000.

15. Therefore, I claim economic damages in the total amount of at least \$185,813 (\$248,813 - \$63,000) for lost wages and \$2,440,000 (\$100,000 + \$840,000 + \$1,500,000) for past and future medical expenses.

16. I believe that this total economic damages amount of \$2,625,813 is underestimated and very conservative.

17. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$4,000,000.

18. Accordingly, I estimate that my total economic and non-economic damages are at least \$6,625,813 (\$2,625,813 + \$4,000,000).

19. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

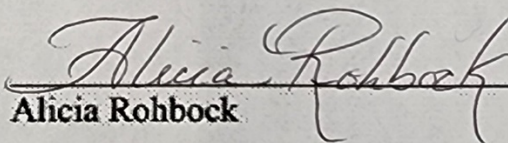
Alicia Rohbock

17. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$4,000,000.

18. Accordingly, I estimate that my total economic and non-economic damages are at least \$6,625,813 (\$2,625,813 + \$4,000,000).

19. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.


Alicia Rohbock